



**US Army Corps
of Engineers®**
Baltimore District

Contribution and Donor Recognition Plan For Baltimore District

August 2014

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1. Introduction

The U.S. Army Corps of Engineers (Corps/USACE), Baltimore District (District), Contributions Program permits the Corps to accept monetary, services, or material contributions from groups (including governmental entities, but excluding project sponsors) and individuals in connection with carrying out water resources projects for environmental protection and restoration or for recreation. Whether in the form of cash, materials, or services, contributions have the potential to result in the sharing of project operational costs and enhance the ability of the project staff to better manage existing facilities in the public interest. In this respect, contributions (including accepting grants) have the potential to enable Natural Resources Management staff to fund some programs and/or projects that have, as a result of reprioritization, either been deferred or delayed due to reduced Operational and Management (O&M) funds.

Contributions accepted will be consistent with Project Master Plans or Operational Management Plans (OMP) and will be carefully screened and evaluated for their suitability. Projects or tasks that are not in consonance with the guidance and policy of the District Contributions Program will not be initiated.

2. Purpose

This Contributions and Donor Recognition Plan is a tool and mechanism used to receive funds, materials, or services from outside resources to complete tasks that are described in the Master Plan or OMP. Contributions can be utilized to accomplish tasks or projects for the protection, improvement, restoration, rehabilitation or interpretation of natural resources, environmental features, recreation areas and facilities or cultural resources at projects.

An essential purpose of this plan is to provide a formal document that describes in general terms the categories or types of work that have been identified in OMPs that are eligible for being accomplished under the authority of the Corps Contributions Program.

In conjunction with describing the general nature or categories of work that may be accomplished through the Contributions Plan, this plan provides guidance on the proper procedures and methods for accepting and documenting contributions, receiving and accounting for monetary and non-monetary contributions, and providing recognition to contributors.

3. References

33 U.S. Code (USC) § 569c, *Services of Volunteers*.

33 USC § 2325, *Voluntary Contributions for Environmental and Recreation Projects*.

33 USC § 2328, *Challenge Cost-Sharing Program for Management of Recreation Facilities*.

Engineer Regulation (ER) 37-1-30, *Financial Administration* – Accounting and Reporting; Chapter 5, Change 9, Accounts Receivable and Collections, 15 Sept. 2010.

Engineer Regulation (ER) 1130-2-500, *Project Operations – Partners and Support (Work Management Policies)*: Chapter 10, The Corps of Engineers Volunteer Program; Chapter 11, Contributions Program; and Chapter 12, Challenge Cost-sharing Program.

Engineer Pamphlet (EP) 1130-2-500, *Project Operations – Partners and Support (Work Management Guidance and Procedures)*: Chapter 10, The Corps of Engineers Volunteer Program; Chapter 11, Contributions Program; and Chapter 12, Challenge Cost-Sharing Program.

Headquarters, U.S. Army Corps of Engineers, *Contributions, Fundraising, and Recognition Reference Guide*, October, 2008. (*Appendix C*)

Memorandum from CECW-CO for Chiefs, Operations Division, Major Subordinate Commands and District Commands, Subject: Contribution and Donor Recognition Plan Sample Template and Clarification of Authorities Related to Construction by Non-Federal Entities at USACE Civil Works Projects, dated 8 December 2011. (*Appendix D*)

Memorandum from the Office of the Chief Counsel to CECW-CO, Subject: Construction by Non-Federal Entities at USACE Civil Works Properties, dated 21 November 2011 (Further clarification explaining the authority to accept construction services as a contribution). (*Appendix E*)

4. Authority

4.1 Authority to Accept Contributions: 33 USC § 2325 authorizes the Corps to accept contributions of “cash, funds, materials, and services” “in connection with carrying out a water resources project for environmental protection and restoration or a water resources project for recreation.” 33 USC § 2328 authorizes the Corps to accept contributions of “funds, materials, and services” “to share the cost of managing recreation facilities and natural resources at [Corps] water resource development projects.” Additionally, 33 USC 569c authorizes the acceptance of services of volunteers. The term “contribution” includes anything of value (funds, materials, supplies, or in-kind goods or services) received from an outside source without consideration or an exchange of value, but does not include construction or real estate. Funds or other items received as a result of a competitively awarded grant from a foundation are also considered a “contribution”.

4.2 Acceptable Donors: The Corps may accept contributions from individuals, organizations, foundations, governmental entities, corporations and businesses. Contributions may be accepted only for programs and activities contained in approved annual or five-year operation management plans (OMP). If a Federal grant is involved, a note or letter from the granting agency is needed stating the money is acceptable to use on Corps property.

4.3 Prohibited Donors: Contributions from a project sponsor (i.e. the party with whom the water resource project has been jointly created, a party to a project cooperation agreement (PCA) or project partnership agreement) may not be accepted through the Contributions Program. Real Estate cannot be accepted as a donation through Contributions Program. For information on whether a particular donation should be accepted or for further information on authorities and constraints, see Section 5.1, of the Contributions, Fund Raising, and Recognition Reference

Guide or ER 1130-2-500, Chapter 11. Contributions from an entity which would reflect negatively upon the USACE shall be declined.

4.4 No Solicitation of Contributions: Corps employees may not solicit or take any actions that gives the appearance that they are soliciting contributions in support of the Corps programs or activities. The term “solicit” means any request made to a non-federal entity, group or individual for contributions to be made directly or indirectly to the Corps. There are, however, appropriate activities that Corps employees may undertake in relation to authorized fundraising by partners. Corps employees can negotiate with partners in the context of a partnership agreement and partners can then fundraise to generate their contribution to the partnership.

4.5 No Lobbying: Employees shall not engage in lobbying activities.

4.6 Ethical Considerations: Corps employees are subject to ethics regulations which prohibit federal employees from giving preferential treatment to any entity or individual. Employees may not use their official title, position or authority of their public office to endorse any product, service or enterprise.

4.7 Maintaining Public Confidence in the Integrity of the USACE. Before accepting, utilizing or recognizing direct contributions, a manager must consider the following factors:

- Maintain the integrity of the USACE programs and operations:
 - The donation is not, or does not appear (by its size or circumstances) to be an attempt to influence any significant USACE decision or action that would affect the donor’s interests, or obtain special treatment in dealing with the USACE.
 - The donation and any conditions or restrictions on it are consistent with, law, regulation, USACE policy, authorized project purposes or applicable project plans.
 - The donation will not be used by the donor to state or imply USACE endorsement of the donor or the donor’s product, service or enterprise.
- Maintains public confidence in the USACE and its programs and employees:
 - Acceptance would not likely result in public controversy (e.g. whether an Internet search reveals the donor has a public history of violations, criminal or civil in nature).
 - The donation comes only with conditions that are consistent with USACE program and policy goals.
 - The donation consists of only goods and services needed by the USACE.
 - The donor has no known involvement in litigation or other current disputes with the USACE.

4.8 Designation: The Chief, Flood Risk Management Branch/Section, shall serve or appoint staff to implement the District Contributions Program, including the District Coordinator for the Contributions Program.

5. Review and Approval

- Before receiving a contribution other than from a contribution box, the contribution must be evaluated as follows: Contributions of less than \$2,500 do not require approval from the District Office unless there are concerns about whether the contribution meets the guidance and policy of the District Contributions Program.
- For any contribution valued between \$2,500 and \$100,000, the Operations Project Manager must coordinate with the District Contributions Program Coordinator to perform a search to determine whether publicly available information exists that raises concerns about the propriety of accepting the contribution. For contributions valued more than \$100,000 and less than one million, the Operations Project Manager will refer the proposed donation to the district Flood Risk Management Office. The Flood Risk Management Office shall consult with the District Office of Counsel and shall evaluate the proposed contribution. The following are examples of considerations in the review process:
 - Whether the donor is involved in litigation or other disputes with the USACE;
 - Whether the donor is currently engaged in or seeking a business relationship with the USACE;
 - Whether the donor has been debarred or suspended from contracting with the federal government;
 - Whether the donor has a recent public history of violations, whether criminal or civil in nature, as disclosed by an Internet search, for which acceptance of the donation could lead to public controversy;
 - Whether the donor is regulated by or is seeking a permit from the USACE.
- The following potential contributions must be reviewed by the Flood Risk Management Office in consultation with the District Office of Counsel and submitted through the MSC to the HQ HRM CoP Office for coordination before subsequent referral to the Director of Civil Works for approval:
 - Single contributions or a series of planned contributions; i.e. a pledge paid in installments by the same donor, valued at \$1 million or more;
 - Contributions that raise significant concerns based on the criteria under the “Maintaining Public Confidence in the Integrity of the USACE” section.
- Contributions may be declined at the discretion of the Commander or Operations Project Manager when they believe, because of the nature of the contribution, its use, conditions imposed, profit motive or the character or notoriety of the contributor, it may appear contrary to, compromising or inconsistent with the laws, regulations, purposes, principles, integrity, standing, or reputation of the Corps of Engineers, the United States Army or the government. Commanders and Operations Project Managers must decline any contribution that would create or give the appearance of a conflict of interest or have conditions inconsistent with the Corps mission.

6. Program Administration (See Appendix A)

6.1 General: The Operations Project Manager shall serve or appoint a member of their staff to lead up a contribution effort ensuring procedures and policies are adhered to utilizing the “Contributions, Fundraising and Recognition Reference Guide”, ER and EP 1130-2-500 Chapters 10,11, and 12. The District Contributions Coordinator will be contacted and input sought prior to accepting a contribution of \$2,500 and greater in one fiscal year.

6.2 Monetary Contributions: Monetary contributions will be deposited into account 96x8862 of the U.S. Treasury according to the requirements outlined in ER 37-2-10, Chapter 5, and treated like a Customer Order with advance in the Corps of Engineers Financial Management System (CEFMS). The advance account should cite the appropriate line of accounting for the final use of funds. The operating project should communicate with Resource Management Office to coordinate the proper line of accounting.

Table 1. Steps to Process Monetary Contributions.

STEP	ACTION	OFFICE
1	Create debtor/vendor record in CEFMS. A record is needed for each operating project.	RM-F
2	Set up Advance Account. An Advance Account is needed for each operating project.	RM-F
3	Funds are collected into the Advance Account and sent to USACE Finance Center (UFC).	RM-B
4	Confirm deposit.	UFC
5	Email received by Budget Analyst confirming deposit. Customer Order is created in CEFMS.	RM-F
6	Provide technical approval for Customer Order and insert work item.	Operation Project
7	Approve Customer Order which releases funding to the work item.	RM-B
8	Funds available for expenditure.	Operation Project

RMO contact staff regarding contributions:

- Resource Management Office, RM-F, Accountant POC (Cyndi Geppi)
- Resource Management Office, RM-B, Accountant POC (Idana Folson)

6.3 Work projects (Unspecified Contributions): Revenue collected from a contributor at a Project that is not designated by the contributor for a specific work project will be transferred to the District RMO for deposit into the proper U.S. Treasury account. Following confirmation of receipt and deposit of these funds into the U.S. Treasury, a specific CEFMS account (i.e. funded work item) will be established for contributions received at the Project. The Operations Project Manager or their designated representative will be responsible for coordinating the establishment of the CEFMS account with Resource Management, Finance (RM-F). Once deposited, these funds will become immediately available to the Project and will only be used for the general work activities listed in this Contributions and Donor Recognition plan.

6.4 Work projects (Specific or Earmarked Contributions): The procedures for deposition of such monetary contributions are the same as for the general contributions, except that a separate CEFMS account (funded work item) will be established for such contributions. Contributions “earmarked” or designated for a specific work item or project will be administered separately from the general contributions account. All such project specific or “earmarked” contributions will only be accepted for implementing work and accomplishing projects that are consistent with the OMP and this Contributions and Donor Recognition plan.

6.5 Use of Contributions: Contributions may not be used for permanent employee salaries. Contributions may be made to fund salaries of term or temporary Corps employees. Contributions will not be used to begin construction or other projects or programs, unless there are sufficient appropriated and donated funds in hand to ensure completion of the work. Donated funds may, however, be used to advance existing project design work.

6.6 Contribution Boxes: A contribution or donation box may be set up at field offices, visitor centers and other appropriate locations. The installation of a contribution box is optional and at the manager’s discretion. The contribution box should be locked and have a sign stating the use of the contributions. It should be clear to the visitor that any money collected is a voluntary contribution and is not required for touring the visitor center, receiving brochures or pamphlets or any other services. Funds from contribution boxes must be accounted for in the same manner as any other donation.

Cooperating Association donation boxes suggested text could state “Voluntary donations are used by the (*insert cooperating associations name*), a non-profit cooperating association that partners with the US Army Corps of Engineers’ to support various outreach and educational efforts at (*insert project name*).” (Note: Funds donated to contributions boxes placed by Cooperating Associations, operated under accordance with EP 1130-2-500 and their Cooperative Agreement, are not subject to this process. The association is responsible for tracking and reporting all funds donated to the association).

6.7 Accepting Direct Donations up to \$2,500: A patron or organization may want to donate to a park but not want to put a check or large amount of cash in the Contribution box. In this case, the Authorized Recreation Fee Collector may receive these funds at their office. A receipt must be given and the Collector must make it clear to the patron that receiving this Contribution is in lieu of placing it in the Contribution box. A standard receipt book is appropriate to use for this purpose. A note should be written stating the purpose of the Contribution.

6.8 Reporting: Each project office that receives contributions must submit an annual report of the total amount of contributions via the Operations and Maintenance Business Information Link (OMBIL). See Appendix B for a sample contribution tracking sheet.

6.9 Deposits, Form, Reports: Engineering Report 3313 (remittance register) should be used to report monthly contributions from a contribution box and all contributions exceeding \$1,000. Contributions may accrue locally until totaling \$1,000 or more when the funds must then be deposited. A weekly deposit is strongly recommended if funds accrue on a regular basis. The Operations Project Manager, or their designated representative, will prepare a monthly report for

the District Contributions Program Coordinator during the months contributions are accepted. The reports will be filed and the amounts confirmed with the Resource Management Office.

6.10 Non-Monetary Contributions: Materials and supplies may be accepted. Coordination with Property/Supply staff in Logistics Management at the Project and/or District Office level shall occur to help determine if an item(s) needs to be identified as capital and inventoried. Recording, accounting, and management of property items will be in accordance with ER 700-1-1. Value and items received will need to be reported in OMBIL in the REC-Annual Update, Partnerships Update.

6.11 Asset Work Item: For projects valued over \$25,000 (labor and equipment included), Project budget staff needs to be informed this it may be an asset work item.

7. Potential Projects

7.1 General: Contributions will be utilized to accomplish tasks or projects for the protection, improvement, restoration, rehabilitation or interpretation of natural resources, environmental features, recreation areas and facilities or cultural resources at the Project.

7.2 Work Categories: The following list, while not comprehensive, provides some generalizations of the general types of projects that are typically identified in a Project OMP.

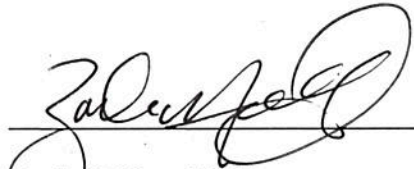
Typical Tasks Identified in Project OMPs & Acceptable for Contributions

General Category	Specific Work Examples
Enhancement of lake aesthetics and recreation facilities	Vegetation plantings in recreation areas Removal of invasive species Repairs/upgrades to facilities Drift and debris removal Signs and marker installation Accessibility improvements
Interpretive and Water Safety Programs	Outreach/promotional supplies and materials Interpretive signage and exhibits Website and Social Media page development Life jackets and other safety equipment Public Affairs/Tourism/Marketing Special programs and events
Environmental Stewardship	Forest management Wildlife management Level 1 and 2 inventories Habitat studies Trail development Develop/enhance GIS database

8. Recognition of Contributions

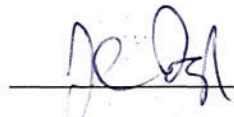
General: Baltimore District shall at a minimum acknowledge all direct contributions in writing through a letter of acceptance which will note the amount of cash donation, or description of materials or services provided. The USACE contribution approver shall be responsible for recognizing the contributor. Procedures for appropriate types of recognition and a sample Certificate of Appreciation are provided in Chapter 11 of EP 1130-2-500. This may serve as a record the donor can use to verify their contribution. The letter should not attempt to value non-cash contributions. News releases coordinated through the district Corporate Communications Office for print, web, radio, and television media may be used to recognize donors through unpaid media. A plaque or other appropriate sign may be purchased and placed on the project site to recognize the donation. A donor board or wall located and integrated into the project office, visitor center, or other appropriate visitor facility may be used to recognize the donation.

9. Approvals




Zach N. Noordhoff
District Contributions Program Manager
Baltimore District Office

25-AUG-2014
Date



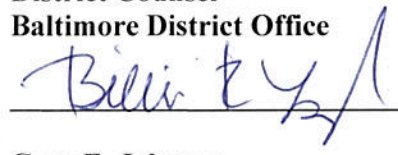
Joe C. Ignatius
Chief, Flood Risk Management Branch
Baltimore District Office

25 Aug 14
Date




Terri A. Davis
District Counsel
Baltimore District Office

9/8/14
Date



Greg E. Johnson
Chief, Resource Management Branch
Baltimore District Office

4 Sep 14
Date

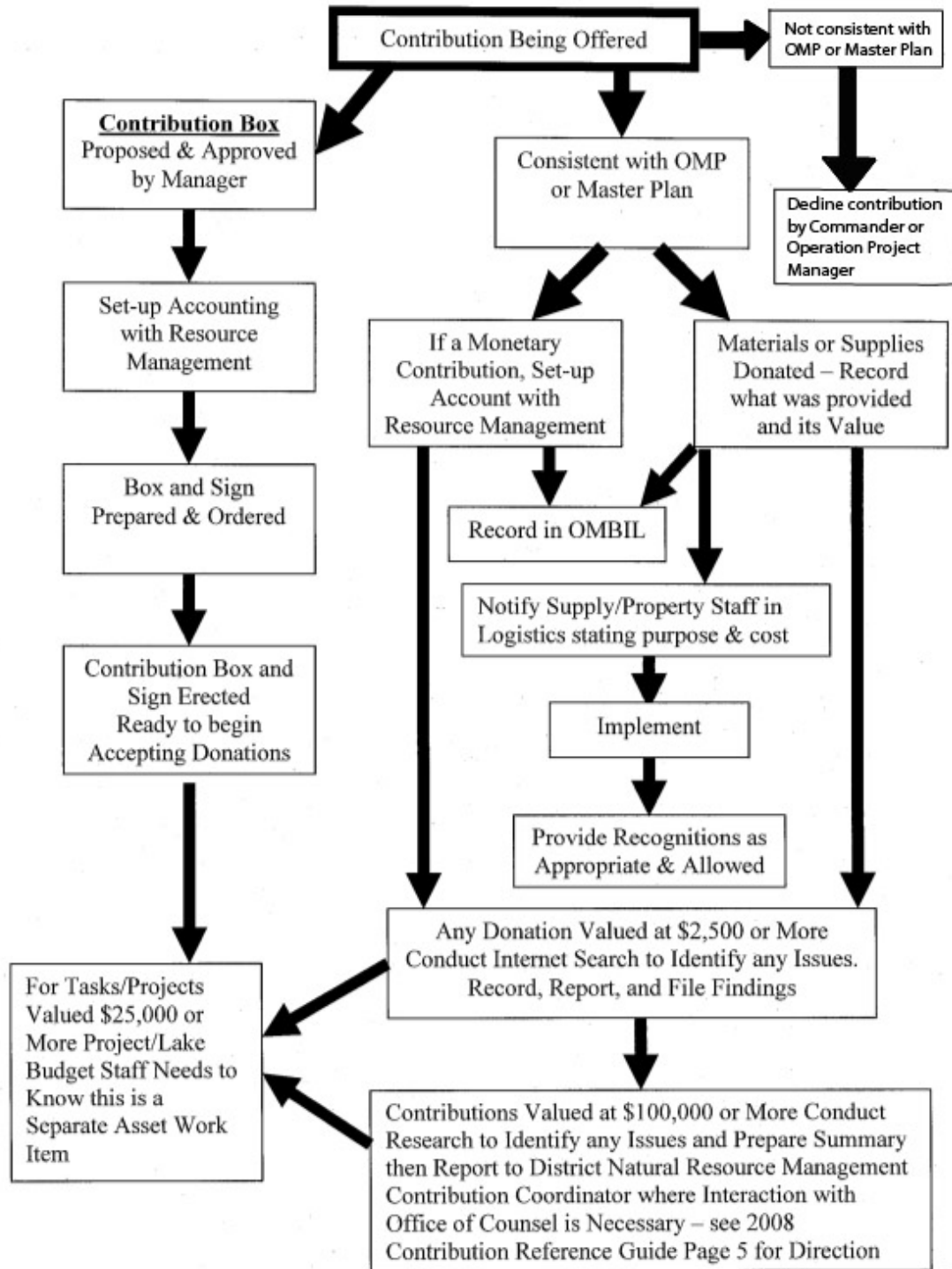


Robert S. Pace
Chief, Operations Division
Baltimore District Office

9 Sept 14
Date

Appendix A

Accepting Contributions - Flow Chart



Contribution Tracking & Record Keeping

Contributions must be entered into OMBIL under REC-Annual Update, Partnerships Update. This form will aid in keeping track of all contributions until OMBIL entry is performed in October of each year.

[illegible]



**US Army Corps
of Engineers**

Appendix C

Contributions, Fundraising and Recognition

Reference Guide

October 2008



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET NW
WASHINGTON, D.C. 20314-1000

FEB 13 2009

CECW-CO

MEMORANDUM FOR COMMANDERS, MAJOR SUBORDINATE COMMANDS AND
DISTRICT COMMANDS, CHIEFS, OPERATIONS DIVISIONS

SUBJECT: Contributions, Fundraising and Recognition Reference Guide

1. I am pleased to announce the availability of the U.S. Army Corps of Engineers Contributions, Fundraising and Recognition Reference Guide (CFRG). The purpose of this guide is to provide consistent information to managers about accepting contributions and working with organizations who seek to raise money to benefit the Corps Natural Resources Management (NRM) Program. The Guide sets forth:

- a. Roles and responsibilities of Corps employees;
- b. Criteria for determining when contributions may be accepted;
- c. Permissible activities associated with fundraising;
- d. Appropriate forms of donor recognition.

2. This guide has been developed in cooperation with the Office of the Chief Counsel. I encourage managers to sit down with their Office of Counsel to review this document together in our continuing effort to provide consistent implementation of our partnering programs. The guide is available at <http://corpslakes.usace.army.mil/partners/policy.html>, part of the NRM Gateway website.

3. Please see this information is given the widest distribution. My point of contact for this activity is Ms. Debra Stokes at (202) 761-1944.

FOR THE COMMANDER:

MERDITH W. B. TEMPLE
Major General, USA
Deputy Commanding General
for Civil and Emergency Operations

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CONTRIBUTIONS, FUNDRAISING AND RECOGNITION REFERENCE GUIDE

1. PURPOSE

The purpose of this Contributions, Fundraising and Recognition Reference Guide is to provide information to managers about accepting contributions and working with organizations who seek to raise money to benefit the U.S. Army Corps of Engineers Natural Resources Management (NRM) Program. The Guide sets forth:

- Roles and responsibilities of Corps employees;
- Criteria for determining when contributions may be accepted;
- Permissible activities associated with fundraising;
- Appropriate forms of donor recognition.

2. AUTHORITIES

2.1 Authority to Accept Contributions. 33 USC § 2325 and 2328 authorizes the Corps to accept contributions “in connection with carrying out a water resources project for environmental protection and restoration or a water resources project for recreation.”¹ Additionally, 33 USC 569c authorizes the acceptance of services of volunteers.² The term “contribution” includes anything of value (funds, materials, supplies or in-kind goods or services) received from an outside source without consideration or an exchange of value. Funds or other items received as a result of a competitively awarded grant from a foundation are also considered a “contribution.”

The Corps may accept contributions from individuals, organizations, foundations, corporations and businesses. Contributions may be accepted only for programs and activities contained in approved annual or five-year operation management plans (OMP).

Contributions from a project sponsor (i.e., the party with whom the water resource project has been jointly created, a party to a project cooperation agreement (PCA) or project partnership agreement) may not be accepted.³ Real estate cannot be accepted.⁴ For information on whether a particular donation should be accepted or for further information on authorities and constraints see Section 5.1, below, or ER 1130-2-500, Chapter 11.

Contributions from an entity which holds or is seeking a concessions contract or which would identify the Corps with alcohol or tobacco products shall be declined.

2.2 No Solicitation of Contributions. Corps employees may not solicit or take any action that gives the appearance that they are soliciting contributions in support of Corps programs or activities. The term “solicit” means any request made to a non-federal entity, group or individual for contributions to be made directly or indirectly to the Corps. There are, however, appropriate activities that Corps employees may undertake in relation to authorized fundraising by partners.

2.3 No Lobbying. Employees shall not engage in lobbying activities.⁵

¹ ER 1130-2-500, Chap. 11

² ER 1130-2-500, Chap. 10

³ ER 1130-2-500, Chap. 11-2(d)

⁴ ER 1130-2-500, Chap. 11-2(c)

⁵ 18 USC 1913

3. POLICIES AND CONSIDERATIONS

3.1 Contributions Plan. Each location that collects contributions shall have a contributions plan that describes the work to be accomplished with any potential contributions. The plan shall be reviewed and updated as necessary as work items are completed and new ones added. This document will become part of the OMP.⁶

Commanders may choose to designate a district contributions plan coordinator. The coordinator helps to assess needs and identify work that can be accomplished with contributions, handles inquiries regarding the program, and keeps the district and project staff current on ideas and procedures for using contributions.⁷

3.2 Ethical Considerations. Corps employees are subject to ethics regulations which prohibit federal employees from giving preferential treatment to any entity or individual. Employees may not use their official title, position or authority of their public office to endorse any product, service or enterprise.⁸

Additionally, employees may not engage in outside activities that conflict with the performance of their official duties.⁹ This does not mean that federal employees, in their personal capacity, cannot be members or leaders of outside organizations. But, employees may not take any official action on matter affecting an organization in which they are an officer or director.

Corps employees may not, in their official capacity, serve on the board, either as a voting member or as non-voting member, including as an ex-officio member, or as an officer or trustee of a cooperating association, friends group or other Corps partner organization.¹⁰ However, Corps employees may be appointed as points of contact or liaisons to non-federal partner organizations as part of their official duties when appropriately appointed.¹¹ Employees may not be appointed as liaisons to organizations in which they are officers or directors.

Employees should consult with their ethics counselor to ensure compliance with ethics requirements.

3.3 Accountability for Contributions. Monetary contributions will be accounted for in accordance with memo dated 21 May 2008, Subject: Collection of Civil Works Appropriation Reimbursements, Enclosure 2 - USACE Accounting Policy and Procedures for Civil Works Collections, paragraph 2. The individual project's administrative officer, district NRM Office or Resource Management Office can provide additional guidance.

All non-monetary contributions must be recorded, accounted for and managed in the same way as other Corps property.¹² Prior coordination with Logistics Management should occur before contributed personal property is accepted.¹³ For record-keeping purposes, the value of the

⁶ ER 1130-2-500, Chap 11-2(h)

⁷ EP 1130-2-500 11-3(e)

⁸ 5 CFR § 2635.702(c)

⁹ 5 CFR § 2635.802

¹⁰ JER § 3-202

¹¹ JER § 3-201(a)

¹² EP 1130-2-500, Chap 11-2(b)(5)

¹³ EP 1130-2-500, Chap 11-3(c)

donated materials and equipment should be determined using the local market value of comparable items.¹⁴

3.4 Anti-Deficiency Act. Entering into an agreement that obligates the Corps to expend funds in advance of the funds being donated may violate the Anti-Deficiency Act. In other words, the Corps cannot spend money it does not have.

3.5 Governmental Functions. The Corps cannot delegate authority to perform inherently government functions to partners through partnership agreements. These are functions so integral to the exercise of government authority that only government employees may perform them.

3.6 Annual Reporting Requirements. Each project office that receives contributions must submit an annual report of the total amount of contributions via the Operations and Maintenance Business Information Link (OMBIL). Division or district offices may require more frequent reports of greater details.

Each project office that receives contributions in the form of volunteer services must maintain and annually report a record regarding the number of volunteers utilized, the number of volunteer hours donated, the value of those hours to the government, and the incidental costs to the government of this volunteer service via OMBIL.¹⁵

The district NRM office can provide additional details and guidance on the content, format, timing and requirements for these reports.

4. ROLES AND RESPONSIBILITIES

4.1 Corps Employees:

- a. Identify projects, programs or objectives that are appropriate for private sector support and describe Corps needs and how contributions could be used to potential donors and the public;
- b. Provide information regarding their ability to accept contributions in support of Corps programs;
- c. Develop lists of programs or activities that the Corps could undertake with donated support and, if requested, discuss these programs with others (e.g., attend events and accompany a partner on visits to prospective donors);
- d. Work with organizations and local businesses in sponsoring events subject to any requirements associated with the approval of sponsorship of events¹⁶;
- e. Consider the costs and any other operational implications that would result from a donation for a work item or a particular use before accepting the donation;
- f. Serve as a point of contact to cooperating associations, friends groups or other partner organizations who may raise funds for the benefit of the Corps;

¹⁴ EP 1130-2-500, Chap 11-3(g)

¹⁵ ER 1130-2-500, Chap 10-2(o)

¹⁶ See JER § 3-206. Employees should consult with their district ethics counselor before initiating any action to involve the Corps in co-sponsoring an event. Co-sponsorship agreements that meet the requirements of JER § 3-206 and fiscal, ethical and procurement rules and regulations must be approved by the USACE Chief Counsel in HQ.

4.2 Corps of Engineers (as an agency):

- a. Recognize donors consistent with Section 7;
- b. Review and approve all informational materials relating to the partnership with the Corps prior to their distribution;
- c. Ensure accountability for all contributions received by the Corps;
- d. Apply for competitively awarded grants from foundations and for grants or similar assistance from non-federal governmental entities, and federal government entities where allowed in that particular program's authorization.
- e. Allow the non-intrusive display and distribution of materials in Corps facilities to educate visitors about an authorized fundraising partnership or activity.

4.3 Partners:

- a. Ensure fundraising for the Corps benefit is conducted in accordance with Section 6;
- b. Communicate Corps-identified needs to potential donors and the public;
- c. Send all fundraising and other informational materials referring to the Corps and/or the approved fundraising project to the Corps for advance review and approval;
- d. Work with the Corps to develop and implement an appropriate donor recognition program consistent with Section 7.

5. CONTRIBUTIONS

This section provides guidance relating to contributions offered directly to the Corps. Section 6 provides guidance for partner review of contributions they receive for Corps NRM projects.

Managers must consider all relevant factors when determining whether to accept a donation, including the value and purposes of the donation, and the nature and interests of the donor. Contributions which are within current authorities, consistent with the Corps mission, and are for work items contained in an approved annual or five-year operation management plan may be accepted.¹⁷ Only contributions for projects and programs that will not cause a significant net increase in O&M costs shall be considered for approval.¹⁸ Examples of relevant factors to be considered are identified in Section 5.1 below.

5.1 Maintaining Public Confidence in the Integrity of the Corps. Before accepting, utilizing or recognizing direct contributions, a manager must consider the following factors:

- a. Maintain the integrity of the Corps programs and operations:
 - i. The donation is not, or does not appear (by its size or circumstances) to be an attempt to influence any significant Corps decision or action that would affect the donor's interests, or obtain special treatment in dealing with the Corps.
 - ii. The donation and any conditions or restrictions on it are consistent with, law, regulation, Corps policy, authorized project purposes or applicable project plans.
 - iii. The donation will not be used by the donor to state or imply Corps endorsement of the donor or the donor's product, service or enterprise.

¹⁷ ER 1130-2-500, Chap 11-2(b)

¹⁸ Id.

- b. Maintains public confidence in the Corps and its programs and employees.
 - i. Acceptance would not likely result in public controversy (e.g., whether an Internet search reveals the donor has a public history of violations, criminal or civil in nature).
 - ii. The donation comes only with conditions that are consistent with Corps program and policy goals.
 - iii. The donation consists of only goods or services needed by the Corps.
 - iv. The donor has no known involvement in litigation or other current disputes with the Corps.

5.2 Reviewing Direct Contributions. These minimum requirements shall be met as part of the review process to assure that contributions to the Corps are properly evaluated:

- a. For any donation valued at \$2,500 or more, the manager must perform a thorough Internet search to determine whether publicly available information exists that raises concerns about the propriety of acceptance.
- b. For contributions valued at \$100,000 or more, the manager shall also refer the proposed donation to the district NRM Office for coordination with Office of Counsel. The following information is collected as part of the review process:
 - i. Whether the donor is involved in litigation or other disputes with the Corps;
 - ii. Whether the donor is currently engaged in or seeking a business relationship with the Corps;
 - iii. Whether the donor has been debarred or suspended from contracting with the federal government;
 - iv. Whether the donor has a recent public history of violations, whether criminal or civil in nature, as disclosed by an Internet search, for which acceptance of the donation could lead to public controversy;
 - v. Whether the donor is regulated by or is seeking a permit from the Corps.

5.3 Approval. The following potential contributions must be reviewed by the local Office of Counsel and submitted through the MSC to the HQ NRM CoP Office for coordination before subsequent referral to the Director of Civil Works for approval:

- a. Single contributions or a series of planned contributions, i.e. a pledge paid in installments by the same donor, valued at \$1 million or more;
- b. Contributions that raise significant concerns based on the criteria identified Section 5.1.

5.4 Acceptance of Contributions from Donors Involved in Litigation. The Corps generally will not accept a contribution from a donor involved in litigation with the Corps. There may be circumstances, however, where the subject of the litigation is sufficiently removed from the proposed donation so as not to create any appearance of impropriety. These circumstances, for example, may exist when a donor proposes a donation to the Corps that is clearly unrelated to the litigation with another Corps office or element or in an amount that does not suggest it is intended to influence the handling of the litigation. The district Office of Counsel must approve all contributions offered by a donor involved in litigation.

5.5 Use of Contributions. Contributions may not be used for permanent employee salaries. Contributions may be made to fund salaries of term or temporary Corps employees.

Contributions will not be used to begin construction, or a phase of construction or other projects or programs, unless there are sufficient appropriated and donated funds in hand to ensure completion of the work to a degree that has independent utility. Donated funds may, however, be used to advance project design work.

Research projects, books, mapping, exhibits, films and all other projects funded with contributions must receive the same reviews and approvals as do projects that use only appropriated funds.

5.6 Contribution Boxes. A contribution or donation box may be set up at field offices, visitor centers and other appropriate locations. The installation of a contributions box is optional and at the manager's discretion. The contribution box should be locked and have a sign stating the use of the contributions. It should be clear to the visitor that any money collected is a voluntary contribution and is not required for touring the visitor center, receiving brochures or pamphlets or any other services.¹⁹

Funds received from Corps donation boxes must be accounted for in the same manner as any other donation, see Section 3.3 for additional information.

The Corps may allow the placement of an authorized fundraising partner's donation box within the Corps project facility through a written agreement. Such donation boxes may recognize the role of a Corps partner in maintaining the box under its agreement with the Corps.

5.7 Displays and Fundraising Activity Information. The Corps may allow the non-intrusive display or distribution of materials on its projects to educate visitors about an authorized fundraising partnership or activity. The material must identify the Corps fundraising partner and inform visitors how they may receive additional information. Materials may include donation envelopes, architectural drawings, models, graphics, newsletters or other similar information.

The Corps may authorize links from Corps websites to partner websites that provide opportunities to make electronic contributions provided that such linkages conform to Corps information technology management and security policies, including those pertaining to websites, and are authorized by the written agreement between the Corps and partner.

6. FUNDRAISING BY OUTSIDE ENTITIES

The implementation of many partnership projects depends upon monetary support and fundraising for obtaining the necessary funds. Non-federal organizations support partnership projects by providing in-kind services, contributions and participating in fundraising campaigns. It is important to understand that negotiating and documenting a partnership arrangement, where the Corps and a partner are coming together and contributing resources towards a mutually beneficial outcome, is not considered fundraising. Corps employees can negotiate with partners in the context of a partnership agreement and partners can then fundraise to generate their contribution to the partnership.

¹⁹ EP 11309-2-500, Chap 11-3(j)

6.1 Review of Contributions. In many cases, donors contribute to a non-profit partner of the Corps with the partner subsequently making the donation to the Corps. Most non-profit partners also have their own professional standards under which contributions are screened. Donor review is required of partners engaged in fundraising for the benefit of the Corps to determine if the contributions are consistent with the purpose and mission of the Corps and are in the best interest of the agency. A donation with conditions on its use cannot be accepted if those conditions conflict with laws, rules, regulations or Corps policies.

6.2 Fundraising Costs. All costs associated with a fundraising effort, including required plans and studies, are the responsibility of the fundraising partner.

6.3 No Lobbying for Federal Funds. Partners shall not seek appropriations from Congress to support any ongoing or proposed partner activity or project, including federal appropriations for construction, renovation, property acquisition, leasing administration or operations.

7. DONOR RECOGNITION

Recognizing the support of donors is very important. The Corps is appreciative of contributions that aid in the accomplishment of its mission and will thank all donors in a manner consistent with the mission and goals of the Corps. Specific forms of donor recognition may include letters or certificates of appreciation, news releases, photo opportunities, ribbon cutting ceremonies, articles in the project news briefs or other appropriate means.²⁰ Recognition will avoid any suggestion of commercialization, advertising or endorsement of a product, service or organization.²¹ Personnel may recommend exceptional donors to HQUSACE for possible special recognition.²²

Recognition is a way to reinforce the “thank you” to the donor. The partner should be involved in developing a donor recognition plan to help identify, in advance, what recognition opportunities are available and not available.

At minimum, the Corps will acknowledge all direct contributions in writing through a letter of acceptance which will note the amount of the cash donation and serve as a record the donor may use to verify their charitable contribution.

Donors will often view a donation to a partner’s fundraising effort as a donation to the Corps itself. In these cases, it may also be appropriate that both the partner and the Corps express appreciation consistent with Corps policy.

Although recognition is important, the recognition must avoid any suggestion of commercialization, advertising or endorsement of a product, service or organization.²³ The recommendation or promotion of commercial enterprises, products and services are considered endorsements. Agencies and employees may not from refer to commercial enterprises or brand names of commercial products in interviews and in written, audio, and visual materials. However, acknowledging the contributions of an organization including a commercial enterprise is not considered endorsement when the business, products and services are not promoted or recommended.

²⁰ EP 1130-2-500, Chap 11-6(a)

²¹ Id.

²² Id.

²³ Id.

7.1. Donor Recognition Plan. A donor recognition plan sets out the basic philosophy to guide donor recognition activities. It provides a framework for donor recognition at a project, ensuring that recognition is commensurate with the level of the donation, while allowing a measure of flexibility to meet the needs of individual donors. The plan also helps fundraising partners understand the means and levels of recognition that the Corps can provide.

A donor recognition plan is required for all projects that receive or are likely to receive contributions. While these plans will vary in size (depending upon the size of the program) and from project to project, there are several fundamental guidelines that control all such plans.

Donor recognition plans should include, at a minimum, the following elements:

- a. A statement of the basic philosophy of donor recognition opportunities consistent with project mission, purposes and plans;
- b. Procedures for acknowledging/thanking donors;
- c. Hierarchy of donor levels and associated recognition;
- d. The range of allowable forms of in-project recognition, as well as the appropriate locations, consistent with this section;
- e. Criteria for donor boards or walls, if any, including the location, minimum thresholds for recognition and length of time the recognition is in place;

Donor recognition plans for projects that receive minimal contributions (less than \$5,000 annually) may simply be a memo stating that the project will send a thank you note in response to any donation over \$100.

Donor recognition plans are developed and approved at the project level with the concurrence of the operations project manager and Office of Counsel. Division or district chiefs of Operations may establish common recognition standards that apply to all projects within their division or district.

Partner donor recognition plans should complement the project plan with respect to the donor recognition provided by the Corps. Operations project managers should review and approve partner donor recognition plans to ensure consistence between the two. This will ensure that a fundraising partner will not inadvertently lead a prospective donor to expect a level of recognition that the Corps cannot, or will not, fulfill.

7.2 Corps Communication Mark (Logo).²⁴ Normally, the Corps does not permit its Communication Mark (the registered Castle and Signature logo) to be used on materials or in connection with events in which it does not participate. Such use might appear to imply endorsement of the organization, company or product. If a partner requests to use the Mark, approval by the Office of the Chief Counsel is necessary. Any such request should be in writing and forwarded through the NRM chain to the Office of the Chief Counsel. Advertising and marketing slogans and taglines may not appear in conjunction with a credit line or the Communication Mark.



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²⁴ EP 310-1-6, 1-1

7.3 Off-Site Recognition. Most donor recognition should occur outside Corps facilities, through letters or certificates of appreciation, news releases, articles in the project newsletters or other similar means. Examples of appropriate off-site recognition include:

- a. Thank You Letters or Certificates of Appreciation – (Examples 1 and 2) All donors should promptly receive a letter or certificate of appreciation (ENG Form 4883-R as in Appendix S of EP 1130-2-500 or a locally designed certificate). The thank you letter can be used as the Corps letter of acceptance of the contribution and to acknowledge or articulate any condition that might apply to, as well as to express appreciation for, the donation. It should acknowledge the contribution, the donor, date of acceptance and, if cash, the dollar amount. It should also fairly describe in-kind contributions. The letter should not attempt to value non-cash contributions.
- b. Publicity (unpaid media) – (Examples 3 and 4) News releases to newspapers, magazines, web, radio and television media, articles in Corps or project newsletters and articles in the donor's media (e.g., corporate employee newsletter, annual report) are a few of the ways the Corps may publicly recognize donors through unpaid media. This form of recognition should be coordinated with the district's Public Affairs Office.
- c. Events – Media events, press announcements, photo opportunities, ground breakings, ribbon cuttings, festivals, clean-up days and other activities or forums in which the donor is involved (e.g., annual meeting/convention of non-profit organizations) can be used to provide high-profile donor recognition. Some of these events may be held on-site in accordance with Corps policy. Corps projects may recognize partner or donor support on banners, posters, T-shirts, flyers and similar items. If the Corps is the primary host, it should be clear that it is a Corps event held in cooperation with "xyz" organization or company.
- d. Agency Websites - (Example 6) The Corps may recognize on its website, the partnership with an organization or to function as a donor recognition board.
- e. Non-monetary recognition - Plaques or other mementos may be offered to recognize outstanding individuals and express gratitude. Certificates should display the Corps Communication Mark or other appropriate inscription related to the recognition. Monetary or cash awards cannot be offered.
- f. Recognition ceremonies - Ceremonies provide excellent opportunities to communicate partnership accomplishments.

7.4 On-Site Recognition. In some cases a contribution may warrant on-site recognition. This form of donor recognition will likely occur in the project visitor center or other similar facility or developed area.

The Corps will avoid on-site recognition that might clutter, detract or interfere with scenic value of the environment or project facilities.²⁵ Limited use of small markers or plaques may be appropriate on some locations as a way to provide recognition of a donation, express gratitude and encourage others to contribute.²⁶ On-site recognition is typically provided in the form of a

²⁵ EP 1130-2-500, Chap 11-6(b)

²⁶ Id.

credit line or statement of appreciation by the Corps. Examples of appropriate on-site recognition include:

- a. Credit lines. (Example 7) Use credit lines to acknowledge contributions of partnered products and on-site recognition. A credit line is a short, discrete, unobtrusive statement expressing appreciation typically found at the end of the material or item or on a donor recognition plaque. Only short, discrete, tasteful donor credit lines, including name script or a logo, are appropriate on printed or electronic material, audio/video products, wayside exhibits, kiosks, interpretive signs or as recognition for a special event.

Recognition of donors can include names, name script and logos. Recognition may not include specific product names, slogans or advertisements.

- i. Brochure or other printed material: The credit line on a lake brochure may state: “This brochure was made possible through the contribution of <logo, name script, or name>.”
 - ii. Electronic material (video/film/etc): The donor recognition may appear either at the beginning of the presentation or at the end. However, the use of digital on-screen graphics or “bugs” are not permissible forms of donor recognition. In the case of computerized information kiosks or other electronic displays to be placed in visitor service areas, the credit line containing the donor name script or logo may appear either at the beginning of the presentation or at the end.
- b. Recognition within interpretive programs. Where a donation is integrally related to the lake/project, to the existence of the lake/project, or to what is being interpreted, interpretive programs may identify the donor and how the donation was used.
- c. Temporary construction/restoration signs²⁷: (Example 8) A temporary sign may recognize donors’ contributions to a restoration or construction project. The sign should be informational, of appropriate design and scale, and express clearly that the Corps is recognizing the donation. It should inform visitors about the nature of the project and the support of the donor. The sign may remain in place for the duration of the work and should be removed shortly after the work has been completed.
- d. Partner logos and the Corps Communication Mark. The logo of a donor(s) may appear in conjunction with a credit line. The Corps Communication Mark may also appear on jointly produced products or interpretive materials.

The Communication Mark has been registered with the US Patent and Trademark Office. The ® symbol is to be displayed with the Mark only when reproducing printed promotional material that is intended for public usage.

- -
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 - e. On-site displays, name plaques and plates. (Example 9) When on-site displays are deemed appropriate, tasteful and unobtrusive plaques or other treatments may be used. The duration of this form of recognition may vary depending on the project, donation and location.

²⁷ EP 310-1-6a

- i. Plaques are not to be affixed to the “historic fabric” of structures nor should they, or any other donor recognition treatment, be placed in natural zones or cultural zones where they would intrude on the character of the area.
 - ii. Plaques acknowledging the contribution of a donor to the restoration or rehabilitation of a room or facility are allowed. As an example, a plaque may state: “The renovation of this room (or facility) was made possible through the generous donation of (fill in the name).”
- f. Donor boards/walls. (Example 10) Donor recognition boards, walls or plaques are permitted in visitor centers or other appropriate visitor facilities.
 - i. These boards or walls should utilize a format that allows recognition of donors by the placement of name plates or other markers that can be added and removed with relative ease.
 - ii. A project’s donor recognition plan should establish criteria for any donor boards or walls, including minimum thresholds for recognition and duration. The names of corporate or business donors will appear in the same fashion as all other names. Corporate name scripts and logos will not be used on donor boards and walls.
 - iii. Donor boards and walls, either electronic or traditional, should be integrated into the design of the facilities.
- g. Slogans and taglines. To maintain Corps policy that its facilities be free of commercialism, advertising and marketing, slogans and taglines may not appear under any circumstances. Donor recognition is not allowed on motor vehicles or on bricks, benches or other facility furnishings.
- h. Naming rights. The naming of rooms, features or lake facilities **will not** be used to recognize contributions of any kind to a lake/project or the Corps.

8. EVENTS HELD AT CORPS FACILITIES

Events fall into two categories: non-Corps events allowed under special use permit and events wholly or partially held by the Corps. In either case, they may recognize corporate participation by limited use of corporate logos and name script on temporary event facilities (signs, T-shirts, literature (Example 5)). These items may be used at all such special events provided the size, scale, scope and location of corporate logos and name script does not dominate the event facilities or area. This is to ensure there is not commercialization of the event or project.

8.1 Corps Held Events. For official Corps events, the Corps may provide appropriate recognition provided corporate names are not used in a way that would imply or suggest Corps endorsement of a product or company, or be construed as commercial solicitation or advertising. The purpose of such recognition is simply to acknowledge the participation of a partner. To ensure against the appearance of endorsement, any conditions on the offering or acceptance of a contribution should be included in an exchange of letters or other written documentation. They would include provisions specifying the amount, type and size of recognition signs.

On-site notices (e.g. banners) must be appropriate to the character and scale of the event. The project manager may display such notices for a period of time in advance of the event to encourage public attendance. Partners may be permitted to establish a temporary hospitality area for special events.

8.2 Non-Corps Events. Notices on temporary displays directly associated with the event containing the partner(s) names or logos or name script may be placed in close proximity to the event in both time and location.

8.3 Additional Requirements. Additional requirements may exist at specific Corps areas.



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
WASHINGTON, D.C. 20314-1000

DEC 8 2011

CECW-CO

Appendix D

MEMORANDUM FOR CHIEFS, OPERATIONS DIVISION, MAJOR SUBORDINATE COMMANDS AND DISTRICT COMMANDS

SUBJECT: Contribution and Donor Recognition Plan Sample Template and Clarification of Authorities
Related to Construction by Non-Federal Entities at USACE Civil Works Projects

1. I am pleased to announce the availability of a new template for U.S. Army Corps of Engineers Contribution and Donor Recognition Plans, providing a format for development of project-level or district-level Contribution and Donor Recognition Plans. The template has been reviewed and approved for use Corps-wide by HQUSACE Resource Management and Office of Counsel.
2. Projects/districts that already have a plan do not need to create a new version. The sample Contribution and Donor Recognition Plan is purely a tool to help with development; it is not a mandatory format, nor does it have to be copied word for word. Each location that elects to use this sample should amend certain sections of the document to match their processes.
3. References:
 - a. Memorandum from the Office of the Chief Counsel to Ms. Heather Burke, National Partnership Program Manager, subject: Draft Contributions and Recognition Plan, dated 12 October 2011 (Approval by OC of sample contribution plan template)
 - b. Memorandum from the Office of the Chief Counsel to CECW-CO, subject: Construction by Non-Federal Entities at USACE Civil Works Properties, dated 21 November 2011 (Further clarification explaining the authority to accept construction services as a contribution)
4. Please note that the authority under which the U.S. Army Corps of Engineers may accept construction services as a contribution is separate from 33 U.S.C. §§ 2325 and 2328, which permit USACE to accept contributions of “funds, materials, and services” from non-federal entities (NFE). 16 U.S.C. § 460d grants the authority by which non-federal partners and volunteers may perform voluntary construction on USACE properties regardless of whether a real estate instrument is required. Volunteer construction may or may not require a real estate instrument. The requirements for the use of real estate instruments are clearly laid out in 16 U.S.C. § 460d.
5. This does not affect the operation and management of our Volunteer, Contributions, or Partnership programs. We will continue to work with partners and other volunteers to assist in the operation and maintenance of our recreation facilities and effectively manage our natural resources, including activities that involve construction or modifications of existing facilities.
6. This memo ensures that NRM personnel are aware of the authority under which NFE construction is performed, and provides a record by which USACE will know which programs could be affected if Congress were to ever amend 16 U.S.C. § 460d.


7. ER 1130-2-500, Chapter 11-2, (5)h. states "Each location that collects contributions shall have a contributions plan that describes the work that will be accomplished with any potential contributions." It is our goal that, at a minimum, all districts shall have a Contributions and Recognition Plan in place by the end of this FY. To streamline the process, a district may select to develop one plan for all projects within the district, instead of each individual project developing a plan. This will meet the intent of the regulation and bring projects into compliance.

8. We plan to keep track of which projects/districts are in compliance with this ER. Please send your approved plans to Ms. Heather Burke as they are developed and she will post them on the Gateway. As of today, we are only aware of two districts and 4 projects with Contributions Plans in place. Existing district and project-level plans are posted on the NRM Gateway at <http://corpslakes.usace.army.mil/employees/contribute/recog.cfm>

9. If you have any questions or concerns, my point of contact for this memorandum is Ms. Heather Burke, National Partnership Program Manager, (503) 808-4313.

FOR THE COMMANDER:

Encls



MICHAEL G. ENSCH
Chief, Operations
Directorate of Civil Works

CF:
Chiefs, Real Estate
Chiefs, Office of Counsel

Appendix E

CECC-G

21 NOV 11

MEMORANDUM FOR CECW-CO

SUBJECT: Construction by Non-Federal Entities at USACE Civil Works Properties

1. Purpose. This memorandum is to follow up on our discussions regarding USACE's authority to permit a non-Federal entity (NFE) to perform construction at a USACE water resources development project.

2. Discussion.

a. 16 U.S.C. § 460d is the statutory authority under which USACE may permit an NFE to perform voluntary construction at a USACE water resources development project. Please note that this is a separate and distinct authority from 33 U.S.C. §§ 2325 and 2328, which permit USACE to accept contributions of "funds, materials, and services" from NFEs.

b. As a strictly legal matter, USACE is *not* required to execute any form of real estate instrument with, or grant any type of real estate interest to, the NFE before USACE may permit the NFE to perform construction on USACE property under 16 U.S.C. § 460d. This is because the authority to permit NFE construction under § 460d is textually distinct and separate from the leasing authority conferred under § 460d, indicating that the real estate requirements applicable to the later-conferred leasing authority do not apply to the earlier-conferred construction authority. See 16 U.S.C. § 460d ("The Chief of Engineers, under the supervision of the Secretary of the Army, is authorized . . . to permit the construction of [] facilities by local interests . . . The Secretary of the Army *is also authorized* to grant leases of lands . . .").

c. We recommend that CECW execute a Memorandum for Record or amend the applicable Engineer Regulation to clearly state that 16 U.S.C. § 460d is the authority under which NFEs may perform construction on USACE properties. This both guarantees that CECW personnel are aware of the authority under which NFE construction is performed, and provides a record by which USACE will know which programs would be affected if Congress were to ever amend 16 U.S.C. § 460d.

3. If you have any questions or concerns, POC for this memorandum is the undersigned, available at (202) 761-8561.

/s/

STEPHAN D. RICE
CPT, JA

ROUTING AND TRANSMITTAL SLIP

Date

25 AUG 2014

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. Joe Ignatius

2. Terri Davis

3. Greg Johnson

4. Robert Pace

5.

<input checked="" type="checkbox"/> Action	<input type="checkbox"/> File	<input type="checkbox"/> Note and Return
<input type="checkbox"/> Approval	<input type="checkbox"/> For Clearance	<input type="checkbox"/> Per Conversation
<input type="checkbox"/> As Requested	<input type="checkbox"/> For Correction	<input type="checkbox"/> Prepare Reply
<input type="checkbox"/> Circulate	<input type="checkbox"/> For Your Information	<input type="checkbox"/> See Me
<input type="checkbox"/> Comment	<input type="checkbox"/> Investigate	<input checked="" type="checkbox"/> Signature
<input type="checkbox"/> Coordination	<input type="checkbox"/> Justify	<input type="checkbox"/>

REMARKS

All,

This "Contributions and Donor Recognition Plan" will create a structure for our lake projects to accept or decline monetary, services, or material contributions from groups (including governmental entities, but excluding project sponsors) and individuals in connection with carrying out water resources projects for environmental protection and restoration, or for recreation.

Upon successful acceptance of this plan from representatives listed above, we will pursue Colonel Jordan's signature for Designation of Authority delegating OMs, District Contributions Program Coordinator, Flood Risk Management Branch Chief, and the Director of Civil Works the ability to accept contributions of agreed upon amounts within the Baltimore District.

Please let me know if you have any questions or concerns.

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Zach Noordhoff, CENAB-OP-F

Room No. – Bldg.

8430-Q

Phone No.



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE MD 21203-1715

CENAB-OP-F

2 October 2014

MEMORANDUM FOR

Operations Project Manager, OP-FJ (Hakala)
Operations Project Manager, OP-FR (Krupa)
Operations Project Manager, OP-FS (Bielen)
Operations Project Manager, OP-FT (Schnell)

SUBJECT: Designation of Authority for Contributions Program Donations within NAB

1. The Contributions Program, authorized by Section 203 of the Water Resources Development Act of 1992 (33 U.S.C. § 2325), authorizes the Corps to accept contributions from groups and individuals in connection with carrying out water resources projects for environmental protection and restoration or for recreation.
2. Per ER 1130-2-500, Chapter 11, Contributions Program, paragraph 11-2.f., and EP 1130-2-500, Chapter 11, Contributions Program, paragraph 11-3.e, District Commanders are responsible for administering the Contributions Program within their district and may accept or decline contributions. The Commander may also delegate responsibilities to manage the program to the Operations Project Managers (OMs) at his/her discretion and assign coordination of these duties to a district coordinator within the Civil Works operations element.
3. This memorandum serves to delegate authority to accept Contributions that are in accordance with the "Contribution and Donor Recognition Plan for the Baltimore District". OMs are delegated authority to accept Contributions of less than \$2,500. Authority to accept contributions valued between \$2,500 and \$100,000 is delegated to the District Contributions Program Coordinator. Authority to accept Contributions valued more than \$100,000 but less than \$1,000,000 is delegated to the Chief, Flood Risk Management Branch, of the District's Operations Division. Authority to accept Contributions valued at \$1,000,000, is not delegated and shall be referred to the Director of Civil Works in accordance with the Contribution and Donor Recognition Plan. In addition, OMs should not accept any contribution that would create or give the appearance of a conflict of interest between the partnering group/individual and a Lake Project.
4. Goods and/or services received under the authority of ER/EP 1130-2-500 by Lake projects shall be done so only in accordance with the limitations set forth by Chapter 11 (enclosure 2) of the regulation. A sample of a record keeping document is enclosed for the OMs use. The office of record for contributions collections and supporting

CENAB-OP-F

Subject: Designation of Authority for Contributions Program Donations within NAB.

documentation for program activities is the Operations Project Office. When applicable, disbursing records for any cash collections must remain at the

Lake project office and a copy forwarded to the Operations Project Manager for the Contributions program file.

5. NAB District Coordinator for the Contributions Program is Zach Noordhoff, Natural Resource Specialist (Zachary.N.Noordhoff@usace.army.mil), PH 410-962-6019/FAX 410-962-6038.



J. RICHARD JORDAN, III
COL, EN
Commanding

Encls

CF:
Chief, Operations Division
Chief, Resource Management Office

SUBJECT: NAB Contributions and Donor Recognition Plan Approval

1. HQUSACE and our USACE Natural Resource Management Partnership Advisory Committee (PAC) team would like to have each District adopt a "Contributions and Donor Recognition Plan". Essentially, this plan creates a structure for our flood control projects to accept or decline monetary, services, or material contributions from groups (including governmental entities, but excluding project sponsors) and individuals in connection with carrying out water resources projects for environmental protection and restoration, or for recreation.
2. Per ER 1130-2-500, Chapter 11, Contributions Program, paragraph 11-2.f, District Commanders are responsible for administering the Contributions Program within their District. The Commander may also delegate responsibilities to manage the program to the Operations Project Managers (OMs) at his/her discretion and assign coordination of these duties to a District coordinator within the Civil Works operations element.
3. Upon successful acceptance of this plan from representatives listed above, I will pursue Colonel Jordan's signature for Designation of Authority delegating OMs the ability to accept contributions of less than \$2,500, District Contributions Program Coordinator accepting contributions between \$2,500 and \$100,000, Flood Risk Management Branch Chief accepting contributions between \$100,000 and \$1,000,000, and the Director of Civil Works accepting any contributions valued over \$1,000,000, in accordance with this Baltimore District Contributions and Donor Recognition Plan.



ROBERT S. PACE
Chief, Operations Division

4 Encls

1. NAB Contribution and Donor Recognition Plan
2. Draft Memo Designation of Authority Letter
3. EP 1130-2-500 (27 Dec 96)
4. ER 1130-2-500 (27 Dec 96)

MEMORANDUM FOR RECORD

SUBJECT: NAB Contributions and Donor Recognition Plan Approval

1. References

- a. Contribution and Donor Recognition Plan For Baltimore District
- b. Contribution and Donor Recognition Plan for Savannah District
- c. EP 1130-2-500
- d. ER 1130-2-500

2. HQUSACE and our USACE Natural Resource Management Partnership Advisory Committee (PAC) team would like to have each District adopt a "Contributions and Donor Recognition Plan" to create a structure for flood control projects to accept or decline contributions (monetary, services, or material) from groups and individuals in connection with carrying out water resources projects for environmental protection and restoration, or for recreation.
3. As the Internal Control Administrator (ICA) of the Baltimore District Managers' Internal Control Program (MICP) it is my determination that the Baltimore District's Contribution and Donor Recognition Plan features internal controls that will adequately prevent fraud, waste, and abuse. The plan includes procedures which ensure that donations are used only for items in approved operation management plans, are thoroughly documented and accounted for, and do not create conflicts of interest.
4. The plan's guidelines are consistent with EP 1130-2-500 and ER 1130-2-500. This plan is also in alignment with The Contribution and Donor Recognition Plan for Savannah District. The Savannah District's plan, initiated in 2012, does not feature any additional internal control processes.

A handwritten signature in black ink, appearing to read 'R. Graves', enclosed within a hand-drawn oval.

Encl

RANDALL GRAVES
Resource Management Office
Management, Manpower, and Quality Assurance